

ELIZABETH R. STEFFENBERG V. T. GENE GILMAN, ET AL.
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
Civil Action No.: 04-40113 NMG

PRIVILEGE LOG FOR REQUEST # 37
OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
SCOLL DOES NOT POSSESS ANY PRIVILEGED DOCUMENTS RESPONSIVE TO THIS REQUEST.				

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DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
10/13/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
9/15/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
10/12/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with David West, T. Gene Gilman, Tim Oullette, Scoll Gilman, Aleke Msumba re: Commonwealth Financial
10/6/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with Tim Hogan re: Commonwealth Financial
10/4/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
8/8/2002	AC	Invoice	From Attorney Scoll to Commonwealth Financial	Invoice contains content of conference with T. Gene Gilman
8/16/1999	AC	Invoice	From Attorney Scoll to Commonwealth Financial	Invoice contains content of conference with T. Gene Gilman
7/6/1999	AC	Invoice	From Attorney Scoll to Commonwealth Financial	Invoice contains content of conference with T. Gene Gilman
6/7/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
3/30/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
3/4/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
3/12/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
8/13/1999	WP/OP	Facsimile	From Attorney Scoll to outside counsel for Commonwealth Financial	RE: Commonwealth Financial
7/23/1999	AC/WP/OP	Letter	From Attorney Scoll to T. Gene Gilman	Re: Commonwealth Financial
7/23/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Commonwealth Financial
7/20/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning Commonwealth Financial
7/16/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning Commonwealth Financial
7/22/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Commonwealth Financial
7/22/1999	AC/WP/OP	Facsimile	From Attorney Scoll to outside	Facsimile contains content of communications from T.

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
7/22/1999	AC/WP/OP	Draft Letter	counsel for Commonwealth Financial	Gene Gilman; fax concerns Commonwealth Financial
7/2/1999	AC/WP/OP	Facsimile	Draft Letter from Scoll to T. Gene Gilman	RE: Commonwealth Financial
7/1/1999	AC	Facsimile	From Attorney Scoll to outside counsel for Commonwealth Financial	Facsimile contains content of communications from T. Gene Gilman; fax concerns Commonwealth Financial
7/1/1999	AC/WP/OP	Letter	From Attorney Scoll to T. Gene Gilman	RE: Commonwealth Financial
7/1/1999	AC/WP/OP	Attorney Notes	From Attorney Scoll to T. Gene Gilman	RE: Commonwealth Financial
7/1/1999	AC/WP/OP	Facsimile	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning Commonwealth Financial
3/1/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	RE: Commonwealth Financial
2/12/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	RE: Commonwealth Financial
2/1/1999	AC/WP/OP	Email	From T. Gene Gilman to Attorney Scoll	RE: Commonwealth Financial
2/5/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning Commonwealth Financial
2/5/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	RE: Commonwealth Financial
1/27/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with RE: Commonwealth Financial
2/1/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with RE: Commonwealth Financial
1/26/1999	AC	Facsimile	From T. Gene Gilman to Attorney Scoll	RE: Commonwealth Financial
6/7/2000	WP/OP	Draft Legal Documents with notations thereon by T. Gene Gilman faxed to Attorney Scoll		RE: Commonwealth Financial
6/9/2000	AC	Fax	From T. Gene Gilman to Attorney Scoll	RE: Commonwealth Financial
12/15/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman and KPMG

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PRIVILEGE LOG FOR REQUEST # 39-42
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DEFENDANT, DAVID M. SCOLL

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SCOLL DOES NOT POSSESS ANY PRIVILEGED DOCUMENTS RESPONSIVE TO THESE REQUESTS.

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

ELIZABETH STEFFENBERG,

Plaintiff,

v.

T. GENE GILMAN, STEVEN GILMAN, THE GILMAN INSURANCE AGENCY, INC., DAVID M. SCOLL, ARBOR SECURITIES, LTD., ALLIANCE INVESTMENT MANAGEMENT, COMMONWEALTH FINANCIAL HOLDINGS INC., FINANCIAL LINKS, INC., T. GILMAN & CO., LTD., FIRST ALLIED SECURITIES, INC., PENSON FINANCIAL SERVICES, INC., AVIVA USA CORPORATION, TRADETEK, LTD. and TRADETEK, LLC,

Defendants.

CIVIL ACTION NO. 04-40113-FDS

CERTIFICATE OF SERVICE

I, Sara Discepolo, hereby certify that on September 27, 2004, I electronically filed the foregoing *Supplementation to David M. Scoll's Response to Plaintiff's First Request for the Production of Documents* and caused to be served a courtesy copy of the same to all parties/counsel of record by mailing the same via first class mail, postage prepaid, to the following parties:

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/s/ Sara Discepolo
Sara Discepolo